

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

**UNITED STATES OF AMERICA,**

Plaintiff,

vs.

ARTHUR SAMUELS,

Defendant.

**Criminal No. 13-10252-WGY**

**GOVERNMENT'S MOTION TO UNSEAL  
RULE 11 PROCEEDING MATERIALS**

The United States of America hereby moves this Court for an Order directing that materials relating to the Rule 11 hearings in this case on September 19, 2013 and October 9, 2013, be unsealed. As bases for this motion, the Government submits the following:

1. This Court allowed the motion of the parties to seal the plea agreement in this case. Dkt. Nos. 22 (Exh. A), 23.
2. This Court conducted Rule 11 hearings on September 29, 2013 and October 9, 2013. Dkt. Nos. 26, 28.
3. This Court allowed the motion of the parties to seal a motion to continue the sentencing in this case. Dkt. Nos. 30, 32.
4. Defendant Joan Ruggiero has been disclosed as a witness in United States v. Scott, et al., Criminal Case No. 10-10264-RGS, scheduled to begin June 1, 2015.
5. The Government has an obligation to disclose in United States v. Scott the materials relating to the Rule 11 hearings for defendant Joan Ruggiero.
6. Materials disclosed by the Government in United States v. Scott are subject to a Protective Order restricting further disclosure of materials.
7. Counsel for the defendant has authorized the Government to inform this Court that the defendant assents to this motion.

WHEREFORE, the Government moves this Court for an Order directing that materials relating to the Rule 11 hearings on September 29, 2013 and October 9, 2013, be unsealed.

Respectfully submitted this 12<sup>th</sup> day of May, 2015.

CARMEN M. ORTIZ  
United States Attorney

By: /s/ Victor A. Wild  
VICTOR A. WILD  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I certify that I served a copy of the foregoing motion on counsel of record in this case by electronic filing.

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